

J. RANDALL JONES, ESQ., SBN 1927
r.jones@kempjones.com
MICHAEL J. GAYAN, ESQ., SBN 11135
m.gayan@kempjones.com
MONA KAVEH, ESQ., SBN 11825
m.kaveh@kempjones.com
KEMP JONES LLP
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, Nevada 89169
Telephone: +1 702 385 6000

DAVID R. SINGER, ESQ. (*pro hac vice*)
dsinger@jenner.com
AMY M. GALLEGOS, ESQ. (*pro hac vice*)
agallegos@jenner.com
JENNER & BLOCK LLP
515 South Flower Street, Suite 3300
Los Angeles, California 90071
Telephone: +1 213 239 5100
Facsimile: +1 213 239 5199

RICHARD L. STONE, ESQ. (*pro hac vice*)
rstone@fastmail.com
850 Devon Avenue
Los Angeles, California 90024
Telephone: +1 310 993 2068

Attorneys for Defendants/Counterclaimant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC.,

Plaintiff,

v.

SHELDON ADELSON, et al.,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 2:19-cv-01667-ART-VCF

**JOINT STIPULATION FOR EXTENSION
OF SCHEDULE FOR DEPOSITIONS**

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and
6 INTERFACE OPERATIONS LLC DBA ADFAM (collectively the “Defendants”), by and
7 through their counsel of record, Kemp Jones, LLP, and Jenner & Block LLP, hereby stipulate and
8 agree as follows:

9 1. The Second Amended Scheduling Order (ECF No. 552) places the deadline for fact
10 discovery on June 7, 2022. The Court previously entered an Order allowing for the Parties to take
11 certain depositions following the close of fact discovery on June 7, 2022, and extending the close
12 of fact deposition discovery to August 19, 2022. ECF Nos. 684, 671. For various reasons, the
13 Parties will not be able to complete all fact depositions by August 19, 2022, and need to otherwise
14 amend their previously stipulated deposition schedule. The Parties jointly request that the Court
15 enter the attached Order allowing for the Parties to take two depositions the week following the
16 close of fact deposition discovery on August 19, 2022, and allowing for the Parties’ other
17 depositions to proceed on an amended schedule.

18 2. Specifically, the deposition of Mather Economics LLC’s 30(b)(6) corporate
19 representative will take place on August 22, 2022, and the deposition of Chase Rankin as the
20 Review-Journal’s 30(b)(6) corporate representative will take place on August 24, 2022. These
21 extensions of the fact deposition discovery deadline will not be used as a basis to extend other
22 deadlines or for any other relief.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

3. The following depositions will take place on an amended schedule as follows:

Date	Witness	Duration
July 20, 2022	Review-Journal 30(b)(6) (Steve Hall)	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
July 29, 2022	Adfam 30(b)(6); Review-Journal 30(b)(6) (Steven O'Connor)	Seven (7) hours
August 5, 2022	Katie Horton	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 9, 2022	Frank Vega	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 11, 2022	Review-Journal 30(b)(6) (Chris Blaser)	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 12, 2022	Chris Blaser	Five (5) hours
August 15, 2022	GMG 30(b)(6) (Robert Cauthorn)	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 19, 2022	Review-Journal 30(b)(6) (Glenn Cook)	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 22, 2022	Mather Economics, LLC 30(b)(6)	Seven (7) hours per Fed. R. Civ. P. 30(d)(1)
August 24, 2022	Review-Journal 30(b)(6) (Chase Rankin)	Four (4) hours

4. The close of fact discovery will remain in place on June 7, 2022, with respect to all fact discovery other than the foregoing depositions. The other case deadlines as described in the Parties' previously submitted joint stipulation (ECF No. 671) and as entered by the Court (ECF No. 684) will remain the same.

///

///

///

1 DATED this 19th day of July, 2022.

DATED this 19th day of July, 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP KEMP JONES LLP

3
4 By: /s/ Kristen Martini

By: /s/ Michael Gayan

5 E. Leif Reid, Bar No. 5750
6 Kristen L. Martini, Bar No. 11272
7 Marla J. Hudgens, Bar No. 11098
8 Nicole Scott, Bar No. 13757
9 One East Liberty Street, Suite 300
10 Reno, Nevada 89501-2128

J. Randall Jones, Esq., Bar No. 1927
Michael J. Gayan, Esq., Bar No. 11135
Mona Kaveh, Esq., Bar No. 11825
3800 Howard Hughes Parkway, 17th Fl.
Las Vegas, Nevada 89169

11 PISANELLI BICE PLLC
12 James J. Pisanelli, Bar No. 4027
13 Todd L. Bice, Bar No. 4534
14 Jordan T. Smith, Bar No. 12097
15 400 South 7th Street, Suite 300
16 Las Vegas, Nevada 89101

David R. Singer, Esq., *Pro Hac Vice*
Amy M. Gallegos, Esq., *Pro Hac Vice*
JENNER & BLOCK LLP
633 West 5th Street, Suite 3600
Los Angeles, California 90071

17 ALIOTO LAW FIRM
18 Joseph M. Alioto, *Pro Hac Vice*
19 One Sansome Street, 35th Floor
20 San Francisco, California 94104

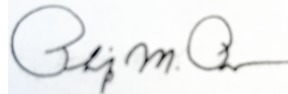
Richard L. Stone, Esq. (*pro hac vice*)
850 Devon Avenue
Los Angeles, California 90024

21 *Attorneys for Plaintiff/Counterdefendants*

*Attorneys for Defendants/
Counterclaimant*

22 IT IS SO ORDERED:

23 Dated this 19 day of July, 2022.



24 SPECIAL MASTER PHILIP M. PRO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada
corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual, and as
the alter ego of News+Media Capital Group
LLC, Las Vegas Review-Journal, Inc., and
Interface Operations LLC dba Adfam;
PATRICK DUMONT, an individual, and as
alter ego of Las Vegas Review-Journal, Inc.,
News+Media Capital Group, LLC, and Interface
Operations LLC dba Adfam; NEWS+MEDIA
CAPITAL GROUP LLC, a Delaware limited
liability company; LAS VEGAS
REVIEWJOURNAL, INC., a Delaware
corporation; INTERFACE OPERATIONS LLC
DBA ADFAM, a Delaware limited liability
company and as alter ego of Las Vegas Review-
Journal, Inc., and News+Media Capital Group,
LLC; and DOES, I-X, inclusive,

Defendants.

LAS VEGAS REVIEW-JOURNAL, INC., a
Delaware corporation,

Counterclaimant,

v.

LAS VEGAS SUN, INC. a Nevada corporation;
BRIAN GREENSPUN, an individual and as the
alter ego of Las Vegas Sun, Inc.; GREENSPUN
MEDIA GROUP, LLC, a Nevada limited
liability company, as the alter ego of Las Vegas
Sun, Inc.

Counterclaim Defendants.

Case No. 2:19-CV-01667-ART-VCF

**~~PROPOSED~~ ORDER EXTENDING
SCHEDULE FOR DEPOSITIONS**

Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
GREENSPUN and GREENSPUN MEDIA GROUP, LLC, by and through their counsel Lewis
Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm, and
Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and
INTERFACE OPERATIONS LLC DBA ADFAM, by and through their counsel of record, Kemp
Jones, LLP, and Jenner & Block LLP, hereby stipulate and agree as follows:

1 1. On May 2, 2022, after the Parties submitted a Joint Stipulation for (1) Extension of
 2 Schedule for Depositions, and (2) Withdrawal of Sun's Motion for an Order Shortening Time
 3 (ECF No. 671), Special Master Pro entered an Order on the Parties' stipulation. As a result, the
 4 updated case deadlines were entered as follows:

5 <u>Close of Fact Discovery:</u>	June 7, 2022
6 <u>Close of Fact Deposition Discovery:</u>	August 19, 2022
7 <u>Expert Disclosures:</u>	September 19, 2022
8 <u>Rebuttal Expert Deadline:</u>	November 18, 2022
9 <u>Close of Expert Discovery:</u>	December 19, 2022
10 <u>Dispositive Motion/Pre-Hearing Briefs Deadline:</u>	January 18, 2023
11 <u>Pretrial Order:</u>	February 17, 2023

12 ECF No. 684.

13 2. The Parties agree and stipulate that the foregoing deadlines remain in place,
 14 however the Parties' deadline to complete certain depositions that have been discussed and
 15 scheduled among the Parties will be on August 24, 2022.

16 3. The Parties further agree that the schedule for other depositions taking place after
 17 June 7, 2022, is amended according to the Parties' joint stipulation dated July 18, 2022.

18 4. The close of fact discovery on June 7, 2022, shall remain in place with respect to
 19 all fact discovery other than the fact depositions identified in the Parties' stipulation.

20 **IT IS SO ORDERED:**

21 Dated this **19** day of **July**, 2022.

22 
 23 SPECIAL MASTER PHILIP M. PRO

PROOF OF SERVICE

I hereby certify that on the 19th day of July, 2022, I served a true and correct copy of the foregoing **JOINT STIPULATION FOR EXTENSION OF SCHEDULE FOR DEPOSITIONS** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

E. Leif Reid, Bar No. 5750
Marla Hudgens, Bar No. 11098
Kristen L. Martini, Bar No. 11272
Nicole Scott, Bar No. 13757
LEWIS ROCA ROTHGERBER CHRISTIE LLP
One East Liberty Street, Suite 300
Reno, Nevada 89501

Joseph M. Alioto, *Pro Hac Vice*
ALIOTO LAW FIRM
One Sansome Street, 35th Floor
San Francisco, California 94104

James J. Pisanelli, Bar No. 4027
Todd L. Bice, Bar No. 4534
Jordan T. Smith, Bar No. 12097
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Plaintiff/Counterclaim Defendants

/s/ Pamela McAfee

An employee of Kemp Jones, LLP